

REMARKS

This is in response to the Office Action dated August 7, 2007. In the Office Action, the Examiner notes that the reply filed on May 15, 2007 is not fully responsive to the prior Office Action mailed April 11, 2007 because of the following omissions or matters: rejection of Claims 1-17 under 35 U.S.C. §103 (a), in view of the McReynolds et al. reference and the Hong et al. reference has not been argued.

By this Supplemental Response to Office Action, Applicants have amended independent Claims 1 and 17. In particular, the recited *"vertical coil"* has been required to include *"a radially exterior surface"* with *"the radially exterior surface being disposed in mechanical communication with the coil support tab."*

Applicants submit that such claim amendments do not introduce any new matter into the case as such concepts are clearly disclosed on the specification. (See Para. [0028])

As indicated above, the prior Office Action had rejected Claims 1-17 under 35 U.S.C. §103 (a), in view of the McReynolds et al. reference and the Hong et al. reference. In this regard, Applicants submit that the cited references, alone or in combination, do not teach or suggest the concept that *"a radially exterior surface"* of a *"vertical coil"* may be *"disposed in mechanical communication with the coil support tab"* as required by amended Claims 1 and 17.

The prior Office Action cites to the McReynolds et al. reference for the concept of *"A coil support tab disposed adjacent the support extensions and extend orthogonal to the horizontal plane (figure 2, item 226)."* (See page 7, Office Action mailed April 11, 2007) However, in view of the claim amendments the Examiner is requested to reconsider the applicability of such reference with regard to Applicants' newly amended *"coil support tab"* and the disposition of the recited *"vertical coil."* Referring to the McReynolds et al. reference, *"item 226"* is a *"strut."* *"An actuator coil 118 is support by strut 226 which forms a portion of a mandrel for winding the coil to the arm."* (col. 3, lines 51-53) As a result, the *"actuator coil 118"* contacts the *"strut 226"* radially internally as clearly seen in Figure 4.

In contrast, amended Claims 1 and 17 require that a radially exterior surface of the coil be disposed in mechanical communication with the coil support tab. It is improper to combine the McReynolds et al. reference with the Hong et al. reference because the explicit teachings and stated purpose of features of the invention disclosed by the McReynolds et al. reference would be defeated by the suggested combination. The combination suggested by the Examiner would result in a design that would not allow windings of a coil to be formed directly upon the actuator as taught by the McReynolds et al. reference. Rather, the suggested combination would require a coil design wherein the coil is preformed and then installed into the actuator. As such, the McReynolds et al. reference tends to teach away from the combined teachings of the cited art as suggested by the Examiner and Applicants' invention as recited in the newly amended Claims 1 and 17.

Applicants acknowledge the Examiner's explanation that it would be "*inevitable*" for an exterior surface of the coil to be in communication with the coil support tab. (Page 7, Office Action mailed August 7, 2007). However, such a combination is improper hindsight construction of Applicants' invention and ignores explicit teachings of the cited McReynolds et al. reference that would render its features inoperable for its stated purpose. Reconsideration of the present obviousness rejection is requested.

Should the Examiner have any suggestions for expediting the allowance of the Application, the Examiner is invited to contact Applicants' representative at the telephone number listed below.

The Commissioner is hereby authorized to charge any payment of required fees associated with this Communication or credit any overpayment to Deposit Account No. 19-4330.

Respectfully submitted,

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